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14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

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17 WESTERN NATIONAL INSURANCE
18 GROUP,

19 Plaintiff,

20 v.

21 CARRIE M. HANLON, ESQ., and MORRIS,
22 SULLIVAN, LEMKUL & PITEGOFF, and
23 DOES 1 through 10 and ROE
24 CORPORATIONS I-X,

25 Defendants.

26 Case No. 2:17-CV-00825-JCM-CWH

27 **STIPULATION AND ORDER TO
28 EXTEND TIME FOR DEFENDANTS TO
RESPOND TO PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
OBJECTION TO MAGISTRATE'S
ORDER DENYING MOTION TO STAY
PROCEEDINGS PENDING OUTCOME
OF STATE COURT APPEAL**

29 **(First Request)**

30 Defendants CARRIE M. HANLON, ESQ. and MORRIS, SULLIVAN, LEMKUL &
31 PITEGOFF, by and through their attorneys of record of the law firm McCORMICK, BARSTOW,
32 SHEPPARD, WAYTE & CARRUTH LLP, and Plaintiff WESTERN NATIONAL INSURANCE
33 GROUP, by and through attorneys of record of the law firm OLSON, CANNON, GORMLEY,
34 ANGULO, & STOBERSKI, hereby stipulate and agree as follows:

- 35 1. On June 12, 2017, Defendants filed an Objection To Magistrate's Order Denying
36 Motion To Stay Proceedings Pending Outcome Of State Court Appeal [ECF No. 17];

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- 1 2. On June 26, 2017, Plaintiff filed an Opposition to Defendants' Objection To
2 Magistrate's Order Denying Motion To Stay Proceedings Pending Outcome Of State
3 Court Appeal [ECF No. 19];
4 3. Defendants presently have until July 3, 2017, to file a reply to Plaintiff's Opposition to
5 Defendants' Objection To Magistrate's Order Denying Motion To Stay Proceedings
6 Pending Outcome Of State Court Appeal;
7 4. Due to an out-of-state family medical emergency that is causing conflicts in counsel
8 for Defendants' schedule, the Parties hereby stipulate that Defendants shall have until
9 July 11, 2017 to respond to Plaintiff's Opposition to Defendants' Objection To
10 Magistrate's Order Denying Motion To Stay Proceedings Pending Outcome Of State
11 Court Appeal; and

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5. This Stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED.

DATED this 3rd day of June, 2017

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By /s/ Dylan P. Todd
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Attorneys for Carrie M. Hanlon, Esq. and Morris,
Sullivan, Lemkul & Pitegoff

DATED this 3rd day of July, 2017

**OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI**

By /s/ Peter M. Angulo
Peter M. Angulo, Esq.
9950 WEST CHEYENNE AVENUE
LAS VEGAS, NEVADA 89129
702-384-4012
Attorneys for Western National Insurance Group

DATED July 3, 2017.

By Xenia C. Mahan
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

2 I hereby certify that on this 3rd day of July, 2017, a true and correct copy of **STIPULATION**
3 **AND ORDER TO EXTEND TIME FOR DEFENDANTS TO RESPOND TO PLAINTIFFS'**
4 **OPPOSITION TO DEFENDANTS' OBJECTION TO MAGISTRATE'S ORDER DENYING**
5 **MOTION TO STAY PROCEEDINGS PENDING OUTCOME OF STATE COURT APPEAL**
6 was served via the United States District Court CM/ECF system on all parties or persons requiring
7 notice.

SERVICE LIST

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By Tricia Dorner
Tricia Dorner, an Employee of
MCCORMICK, BARSTOW, SHEPPARD,
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